



United States Environmental Protection Agency
Region 10 Emergency Response Unit
POLLUTION REPORT

I. HEADING

Date: February 28, 2000
Subject: CleanCare Removal Site (CleanCare), Tacoma, Washington
From: Michael Szerlog, OSC, USEPA, Region 10, Emergency Response Unit
Tel: Office (206) 553-0279
TO: See Distribution List on last page

POLREP No.11 (Progress)

II. BACKGROUND

Site ID: SSID # 106W
Delivery Order No: 081-10 -02
Response Authority: CERCLA,
CERCLIS No: WASFN1002182
NPL Status: Not Listed (former RCRA site within Commencement Bay Superfund site)
State Notification: Washington State Department of Ecology referred site to EPA
Action Memo Status: Signed on December 17, 1999 and January 7, 2000
Removal Start Date: December 17, 1999
Expected Completion Date: March 17, 2001
Site Web Page: www.epa.gov/r10earth, click Index, click C for CleanCare. or use URL: <http://epainotes1.rtpnc.epa.gov:7777/r10/cleanup.nsf/sites/CleanCare>

III. SITE INFORMATION

A. Incident Category

This is a time-critical removal action at an inactive waste management facility

B. Site Description

1. Site Location

The CleanCare site is located at 1510 Taylor Way in Pierce County, City of Tacoma, Washington at Township 21, Range 3 E. in Section 26. The site comprises approximately 4.2 acres latitude 47° 16' 25" North and longitude 122° 23' 32" West. The site is located in the ATacoma Tideflats@ area about three miles northeast of downtown Tacoma. The site is owned by David Bromley of Bromley-Marr ECOS Inc.

The CleanCare site was an interim status treatment, storage, disposal, and recycling (TSD) facility for off-site generated hazardous and non-hazardous wastes - one of a handful of commercial TSDs operating in the state of Washington. When the facility was in operation its major function was to solidify oily sludge wastes originating from catch basins, sumps, and storm drains; recycle waste oils, antifreeze, and spent solvents; and crush used oil filters for off-site recycling by other facilities.

The CleanCare facility has four separate tank farms (Tank Farm (TF)-1, TF-2, TF-3, and TF-4), two hazardous/dangerous waste container storage pads (container storage (CS) CS-4A and CS 4-B), and a processing area where the distillation of solvent, oil, and antifreeze used to occur.

IV. Response Information

A. Situation

1. Current Situation

February 21, 2000 (Monday)

Personnel on site: 4 START, 14 ERRS, 3 USCG, 1 EPA

Weather: overcast, 50-55 F, light breeze

All site personnel attended daily safety meeting and discussed site safety and planned activities. START prepared individual data files for each generator expected to be on site tomorrow to identify their waste. Prepared a table for flash point data for samples collected from T-1. Sampled treated waste water for discharge. ERRS continued staging drums by product name, finished cleaning Baker Tank 3 and 17, finished staging drums by generators with more than 250 gallons, pulled compatibility samples on the spent solvent drums. Emerald Services picked up 35,190 gallons of waste water for disposal.

February 22, 2000 (Tuesday)

Personnel on site: 6 START, 14 ERRS, 3 USCG, 2 EPA

Weather: intermittent rain, high 45 F, wind 5-10 mph

All site personnel attended daily safety meeting and discussed site safety and planned activities. START escorted generators to their drums and documented generator's decisions regarding the disposition of their drums. Prepared draft data summary table for T-1 (samples collected by START, ERRS and DOE). Met with EPA, DOE and ERRS to discuss the disposition of materials in Tank T-1. ERRS escorted generators to their drums and sampled the drums as requested by the generators, continued staging drums by product name, cleaned Baker Tank 20, pulled compatibility samples on the spent solvent drums, pumped rainwater out of CleanCare's open top oil filter trailer, pumped off oil from Baker Tank 19.

February 23, 2000 (Wednesday)

Personnel on site: 6 START, 14 ERRS, 3 USCG

Weather: sunny, cool, high of 45 F.

All site personnel attended daily safety meeting and discussed site safety and planned activities. START collected samples from Baker Tanks 8 and 18, continued management of drum data, and began preparing a facts sheet for the media visit scheduled tomorrow. ERRS continued staging drums by product name, cleaned Baker Tank 20, pumped oil off of Baker Tank, pumped off CleanCare's oil filter trailer, Emerald Services on site to pick up product in Baker Tank, PCS on site to drop off RCRA dumpsters.

February 24, 2000 (Thursday)

Personnel on site: 7 START, 14 ERRS, 3 USCG, 2 EPA

Weather: intermittent clouds, light breeze, high lower 50's

ON SITE NEWS MEDIA VISIT FROM 10:00 TO 11:00 AM.

All site personnel attended daily safety meeting and discussed site safety and planned activities. START completed media facts sheet, documented sampling of drums in Building 5, inventoried spent solvent drums, and continued oversight of on site activities. START and EPA conducted a standard site audit. ERRS loaded dumpsters with RCRA crushed drums, cleaned Baker Tank 4, wiped down Baker Tank 2, staged drums in rows by product name, Emerald Services on site to pick up product from Baker Tank 4 and 5 (38,233 gallons shipped today), Baker Tanks arrived on site to pick up tank 20 and 2, discharged 20,000 gallons of clean water out of Baker Tank 22 into Tacoma city sewer, continued treatment of contact water. OSC and Regional Counsel meet with Puyallup Tribe to discuss removal actions.

February 25, 2000 (Friday)

Personnel on site: 4 START, 14 ERRS, 3 USCG, 1 EPA

Weather: Overcast, light breeze, high in the mid 50's

All site personnel attended daily safety meeting and discussed site safety and planned activities. START inventoried spent solvent drums, recorded data for samples collected from drums in the south end of Building 5, responded to news request for further information about the generators of drummed waste. Completed inventory of vendor drums onsite. Discussed engineering controls and air sampling plan for transfer of materials from ASTs to trucks for disposal off site. ERRS decontaminated Baker Tank 5 and 6, sampled drums, treated contact water, Emerald Services on site to pick up product from baker tanks, 30,320 gallons shipped today, Baker Tanks on site to pickup tanks 2 and 5.

February 26, 2000 (Saturday)

Personnel on site: 0 START, 0 ERRS, 0 USCG

No work performed today.

2. Removal Actions to Date

On January 7, 2000, the Action Memorandum to increase site ceiling, to ask for a \$2 million exemption, a 12-month exemption, and a change of scope was signed. A purchase request was also signed and ERRS was funded, incrementally, to begin removal activities.

The State (Washington Department of Ecology) and the City (City of Tacoma Public Works) continue to provide assistance with discharge of non-contact storm water and treated contact water.

Drums -

Oil Filter Drums: This week no used oil filters, or drums that held used oil filters, were removed from the site. A total of nine rollofs of used oil filters and four rollofs of used oil filter drums have been removed from the site. This phase of the project is completed.

RCRA Drums: All non oil filter drums known to be located on the site (formerly referred to as RCRA drums) have been inventoried. All drums from selected generators have been segregated. Selected generators have been onsite to identify their drums and schedule a date for disposal. Drums of spent solvent and antifreeze have been partially inventoried.

Oil Drums in Building #5: Continued sampling and collecting data for the oil drums located in the southern portion of Building #5 and started performing Hazard Categorization tests on these samples. The material from 35 of these drums and 4 totes was pumped into a 6,000 gallon storage tank to reduce disposal costs. Disposal

facility to be determined.

Antifreeze Drums: 52 drums of antifreeze have been inventoried and pumped into Baker Tank #18 to reduce disposal costs. Disposal facility to be determined.

Baker Tanks - This week 20,000 gallons of water treated onsite was discharged directly to the City of Tacoma. Previously treated and discharged two batches (approximately 40,000 gallons total) of waste water to the City of Tacoma Sanitary Sewer System (total to date is approximately 60,000 gallons). Baker Tanks are decontaminated and returned to the vendor after they are emptied.

Surface Water - This week, continued treating contact surface water and decontamination water with the temporary waste water treatment system. Continued sampling and pumping non contact surface water to the Lincoln Ave. ditch, under agreement with Washington State Department of Ecology.

ASTs - No AST work was performed this week. To date all of the tanks in Tank Farm 1 (T-1, T-3, T-4, and T-5) have been sampled.

Soil - No work was performed this week regarding site soils. To date, 14 soil samples were collected during the assessment phase to characterize site soils.

3.Enforcement

The Region currently has some information regarding potential responsible parties (PRPs) at the site. EPA intends to gather additional PRP information during the removal action.

B.Planned Removal Activities

To minimize/eliminate the threat to human health and the environment posed by the wastes on the site, the following removal activities are planned:

Drums: inventory and verify quantity of solvent drums and waste antifreeze drums, organization of drums and documents (manifests & profile analyses), generator notification, hazard categorization and disposal tests, and removal of containers from the site.

Baker Tanks: The water from some tanks will continue to be treated on site and discharged. At the same time, water from other Baker Tanks will continue to be shipped off site. As tanks are emptied, they will be returned to the rental company.

Surface Water: manage surface water as it collects onsite (including sampling, treatment, and discharge), clean concrete and asphalt surfaces that

currently impact surface water, establish and implement a long term. plan/recommendation for surface water management including possibly construction of an asphalt cap.

ASTs: sampling, handling of contents (off site disposal or combination of onsite treatment and off site disposal anticipated), clean tanks, possible dismantling of some tanks and containment structures and remove from site

Soil: Possible further sampling prior to excavation, confirmation sampling, and removal from site or onsite treatment. Installation of asphalt cap if deemed necessary.

C.Next Steps

EPA, ERRS, START, and the USCG Strike Team to continue managing onsite surface water. Prepare for generator recovery of waste drums. Treat some Baker Tank water, ship some of it off site. Discharge treated water to the Tacoma Sanitary Sewer, in accordance with the Special Approved Discharge (SAD). Decontaminate Baker Tanks as they are emptied and return them to the vendor.

D.Key Issues

Security Off Duty City of Tacoma Police continue with site security.

Discharge of non contact waters Noncontact surface water is being discharged to the Lincoln Avenue Ditch, as needed, with daily permission of the Washington State Department of Ecology (DOE). Discharge requirements established by DOE are being followed.

Management of contact water; Contact surface water (that which falls with in the secondary containment structures) is being pumped into temporary storage tanks (Baker Tanks). This water will has been analyzed and some of it is being treated and discharged and some is being disposed off site. Performing both tasks simultaneously will reduce the length of time required to accomplish this task, reduce the associated costs, such as Baker Tank rental fees, and remove the threat of a release.

Drum/Container Waste; Generators of site waste stored in drums/containers will have the opportunity dispose of their wastes.

V. Cost Information

Estimated costs are summarized below

	Established Ceiling	Estimated Costs (as of 2/26/00)
EPA	\$ 150,000	\$19,400
START	\$ 350,000	\$85,054
ERRS	\$ 1,100,000	\$ 594,720
Coast Guard	<u>\$ 100,000</u>	<u>\$35,329</u>
Total	\$ 1,700,000	\$ 734,503

Note: The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

VI Disposition of Wastes

Waste Stream	Medium	Quantity	Containment-Migration Control	Treatment	Disposal
Used Oil Filters	solid and solidified waste	270 cu yd	placed liners in rolloffs	removed oil filters from 55 gallon drums and consolidated in rolloffs	Waste Management delivered to Olympic View Sanitary Landfill
Used Oil Filter Drums	solid waste	120 cu yd	placed liners in rolloffs	crushed drums with an excavator to reduce volume	Phillips Services Corp. Delivered to Bethlehem Steel for recycling.
Used RCRA Drums	solid waste	95 cu yd	placed liners in rolloffs	crushed drums with an excavator to reduce volume	Phillips Services Corp. Delivered to Columbia Ridge Landfill.
Oily Debris	solidified waste	20 cu yd	placed liners in rolloffs	consolidated in rolloffs	Phillips Services Corp. delivered to Olympic View Sanitary Landfill
Contact Rain Water	liquid	143,743 gal	contained in Baker Tanks	Emerald Petroleum Services (EPS) water treatment plant	EPS, to City of Tacoma Sanitary Sewer
Contact Rain Water	liquid	83,400 gal	contained in Baker Tanks	Phillips Services Corp. water treatment plant	Phillips Services Corp. to City of Tacoma Sanitary Sewer
Contact Rain Water	liquid	60,000 gal	contained in Baker Tanks	treated on site with temporary waste water treatment system	to City of Tacoma Sanitary Sewer
Baker Tanks	solid	Tank 15	NA	pressure washed, and wiped down	returned to Vendor (Baker Tanks, Inc.)
Tip Trailers	solid	11 trailers	NA	transported off site to make room for other activities	temporarily stored at the Phillips Services Corp. facility adjacent to the site
Oil From Drums	liquid	60 drums + 4 totes		a 6,000 gallon poly tank on site	to be determined
Antifreeze from Drums	liquid	65 drums		bulked into Baker Tank #18	to be determined

VII Distribution

To: EPA Headquarters, Washington, D.C. Attention: Terry Eby
EPA Region 10, Emergency Response Unit, Attention: Chris Field
EPA Washington Operations Office, Attention: Julie Hagensen
Washington State Department of Ecology, Attention: Jim Sachet
City of Tacoma Public Works Department, Attention: Michael Kennedy
EPA Region 10 Web page, Attention: Beth Kunz
EPA Region 10, Emergency Response Unit, Attention: OSCs

VII Status

Case Pending.